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Sent: 5/15/2019 7:03:46 PM
To: Witosky, Matthew [Witosky.Matthew@epa.gov]
CC: Ostrand, Laurie [Ostrand.Laurie@epa.gov]
Subject: RE: MACT HH and NSPS OOOOa

Ex. 5 Deliberative Process (DP)

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From: Eric Hodek <EHodek@ramboll.com>
Sent: Wednesday, April 24, 2019 10:52 PM
To: Marsh, Karen <Marsh.Karen@epa.gov>
Subject: More OOOOa/MACT HH questions

Hi Karen,

I'm working through applicability determination for a gas plant. The facility is a major source of HAP, so MACT HH would apply to storage vessels and equipment leaks (including compressors). The facility does not have glycol dehydration. Portions of the plant are subject OOOO and others to OOOOa for compressors, equipment leaks for ancillary equipment and storage vessels. I noted that there are exemptions from MACT HH if you control per OOOO [See 40 CFR 63.766(d) and 63.769(b)]. However, under OOOOa, only storage vessels have an overlap exemption under 40 CFR 60.5395a(e). Other equipment subject to MACT HH (equipment leaks, compressors) would also be subject to OOOOa as 40 CFR 60.5385a and 40 CFR 60.5400a make no exemptions for MACT HH. So my question: Are there mutual exemptions for MACT HH and OOOOa that I'm missing or has EPA provided any guidance on this?

Eric

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From: Marsh, Karen
Sent: Wednesday, May 15, 2019 11:58 AM
To: Ostrand, Laurie <Ostrand.Laurie@epa.gov>; Mia, Marcia <Mia.Marcia@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>
Cc: Witosky, Matthew <Witosky.Matthew@epa.gov>
Subject: RE: MACT HH and NSPS OOOOa

+Matt

We had a similar question come in a few weeks ago.

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From: Ostrand, Laurie

Sent: Wednesday, May 15, 2019 11:53 AM

To: Mia, Marcia <Mia.Marcia@epa.gov>; Marsh, Karen <Marsh.Karen@epa.gov>; Hambrick, Amy <Hambrick.Amy@epa.gov>

Cc: Ostrand, Laurie <Ostrand.Laurie@epa.gov>

Subject: FW: MACT HH and NSPS OOOOa

Hi all

MACT HH, at 63.769(b), says: "This section does not apply to ancillary equipment and compressors for which the owner or operator is subject to and controlled under the requirements specified in 40 CFR part 60, subpart OOOO."

NSPS OOOO, at 60.5370(d), says: "You are deemed to be in compliance with this subpart if you are in compliance with all applicable provisions of subpart OOOOa of this part."

So is a facility subject to the MACT HH LDAR requirements if they are complying with OOOOa?

Thanks

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